

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE BANK OF NEW YORK, as Indenture  
Trustee,

Plaintiff,

v.

TYCO INTERNATIONAL GROUP S.A., TYCO  
INTERNATIONAL LTD., and TYCO  
INTERNATIONAL FINANCE S.A.,

Defendants.  
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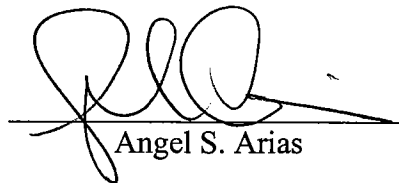
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07 Civ. 4659 (SAS)

**CERTIFICATE OF SERVICE**

I, Angel S. Arias, hereby certify, under penalty of perjury pursuant to 28 U.S.C. § 1746, that on this 28th day of January 2008, I served the Counterclaimants' Memorandum of Law in Opposition to Plaintiff's Motion to Dismiss the First Amended Counterclaims and the Declaration of Megan A. Burns in Opposition to Plaintiff's Motion to Dismiss the First Amended Counterclaims, electronically (via ECF Notification), upon the plaintiff in this action.

Dated: New York, New York  
January 28, 2008

  
Angel S. Arias